

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEALS FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Circuit Court Judge

Case No. 10-CP-40-0657

RECEIVED

SEP 10 2014

SC Court of Appeals

HSBC Mortgage Service Inc.,

Respondent,

v.

Alice Lucas a/k/a Alice Marie Felder-Lucas; Dwight Lucas; Mortgage Electronic Registration Systems, Inc. (MIN #100176105012597608); Mortgage Electronic Registration Systems, Inc. (MIN #1002033-0000024059-5); Windsor Lake Park Homeowners Association, Inc.;

Defendants,

Of Whom Alice Lucas and Dwight Lucas are the Appellants.

Appellate Case No. 2014-000747


REPOSENSE TO RESPONDANT RESPONSE TO OUR AMENDED BRIEF

For the claim is with the knowledge of, the Respondents have responded to our Amended Brief.

1. For the claim is with the knowledge of, the Respondents have given Statements of Facts with No Supporting Affidavits of any firsthand knowledge.
2. For the claim is the Respondent mentioned in their brief that HSBC is the current holder of the Note and owner of the Mortgage, but the President of HSBC has testified before Congress that they Hold No Notes and Never Have (see Affidavit Attached).
3. According to our Statement in #2 above this Case never had Jurisdiction in the Master of Equity Court which leads us to the following:
 - a) For the claim is according to Title 22 CFR 93.1 – 93.2 States that the Department of State has to be notified of any suit, and in turn has to notify the citizen of said suit.

- b) For the claim is according to Title 28 USC 1330 States that the District Court has to grant permission for the suit to be pursued once the Court has supplied sufficient proof that the United States citizen is a Corporate Entity.
4. For the claim is this opens the door to argue that the Entire Foreclosure proceeding and Judgment is VOID according to SC RULE 60b.4 (The Judgment is Void).
 5. For the claim is this also leads to SC RULE 60b.3 (FRAUD) because HSBC does not, nor ever had the Note.


For the claim is, in Conclusion of this matter, the Respondents have given important information that we have objected to and will provide an Affidavit of Truth to what we have stated on our Response to the Respondents Brief to Our Amended Brief.



Autograph
UCC 1-308

9/10/14

Date



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UCC 1-308

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Defendants,

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**AFFIDAVIT TO RESPONDANT TO RESPONDED RESPONSE TO OUR
AMENDED BRIEF**

FOR WITH THIS KNOWLEDGE THE CLAIM IS WE HAVE STATED IN
THE RESPONSE TO RESPONDANT RESPONSE TO OUR AMENDED BRIEF
FACTUAL, TRUTH, AND, CORRECT STATEMENTS. AND FURTHER STATES
THAT PRESIDENT OF HSBC HAS TESTIFIED BEFORE CONGRESS THAT
THEY HOLD NO NOTES AND NEVER HAVE. WE,

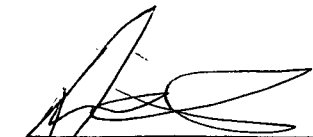
Dwight Lucas AND Alice Lucas ARE FILING
THIS AFFIDAVIT UNDER THE PENALTY-OF-PERJURY.

IN WITNESS WHEREOF, We have here unto set our hand and seal on this
10th day of September, 2014.

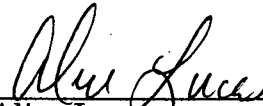
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SC Court of Appeals




Dwight Lucas
UCC 1-308



Alice Lucas
UCC 1-308

Before me, the undersigned authority in the County of Richland
in the State of SC, personally appeared Dwight B Alice
Lucas who is known to me and who sworn to and subscribed
before me this 10th day of September, 2014.



NOTARY PUBLIC

My Commission Expires: _____
My Commission Expires March 30, 2019

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

CERTIFICATE OF MAILING
Proof of Service
RESPONSE TO RESPONDED
RESPONSE TO OUR AMENDED BRIEF

I, Dwight Lucas and my wife Alice Lucas, certify that we sent by
Certified Mail, the attached RESPONSE TO RESPONDED RESPONSE TO OUR
AMENDED BRIEF to the following location(s) on this 10th day of

September, 2014:

RECEIVED
SEP 10 2014
SC Court of Appeals


CT Corporation System
2 Office Park Court – Suite #103
Columbia, South Carolina 29223

[Registered Agent for HSBC Mortgage Services, Inc.]

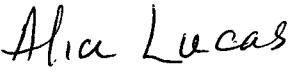
(Foreclosure Department)
HSBC Mortgage Services, Inc.
636 Grand Regency Boulevard
Brandon, Florida 33510
(813) 571-8400 - Telephone

Rebecca K. Lindahl, Esq.
Richard L. Farley, Esq.
Katten Muchin Rosenman, LLP
550 South Tryon Street, Suite 2900
Charlotte, North Carolina 28202

[Attorneys for Plaintiff(s)]


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